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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 Gary A. Quaintance)

Case # 3:19-cv-0340-WGC

9 Petitioner/Plaintiff)

10 vs.)

11 Herb Hallman Chevrolet, dba Champion)
12 Chevrolet)

13 Respondent/Defendant.)
14

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

15
16 Richard Bruce Herman, Petitioner, respectfully represents to the Court:
(name of petitioner)

17 1. That Petitioner is an attorney at law and a member of the law firm of

18 Richard B. Herman, P.C.

19 (firm name)

20 with offices at 350 Park Avenue, Suite 2607,
(street address)

21 New York, New York , 10152,
(city) (state) (zip code)

22
23 212-759-6300, rbh@richardbherman.com.
(area code + telephone number) (Email address)

24 2. That Petitioner has been retained personally or as a member of the law firm by

25 Gary A. Quaintance to provide legal representation in connection with
26 [client(s)]

27 the above-entitled case now pending before this Court.
28

3. That since February 8, 1984, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of New York
(state)
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
from the clerk of the supreme court or highest admitting court of each state, territory, or insular
possession of the United States in which the applicant has been admitted to practice law certifying
the applicant's membership therein is in good standing. (See Exhibit 1).

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
Southern District of New York	2/28/1984	RH6524
Eastern District of New York	2/28/1984	RH6524
Western District of New York	3/1/1984	NA
Ninth Circuit Court of Appeals	2/13/2013	NA
Pennsylvania	11/17/1989	56143
District of Connecticut	7/2/1993	ct12397
Supreme Court of the State of New York	4/20/1987	NA

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

In 2012, there was an administrative suspension for an out of state, non-practicing attorney in Pennsylvania based upon a clerical error for dues renewal. At all times, Richard B. Herman is a full-time attorney in New York and never an in-state practicing attorney in Pennsylvania.

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 None
4
5

6 7. That Petitioner is a member of good standing in the following Bar Associations.

7 New York Council of Criminal Defense Lawyers
8 New York Criminal Bar Association
9 New York State Bar Association
National Association of Criminal Defense Lawyers

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied	
2/1/2013	US v. Granata	District of Nevada	Granted	<input type="button" value="v"/>
	2:12-cr-440-RCJ-GWF		Granted	<input type="button" value="v"/>
2/18/2014	US v. Desage	District of Nevada	Granted	<input type="button" value="v"/>
	2:13-cr-39-JAD-VCF		Granted	<input type="button" value="v"/>
				<input type="button" value="v"/>

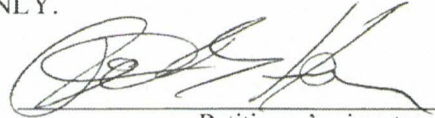
18
19 (If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.
27
28

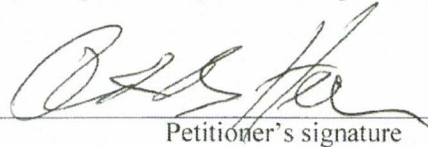
1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
2 FOR THE PURPOSES OF THIS CASE ONLY.

3
4 

Petitioner's signature

5 STATE OF Nevada ☐)
6 COUNTY OF Clark)

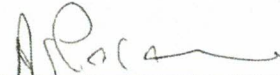
7 Richard B. Herman, Petitioner, being first duly sworn, deposes and says:
8 That the foregoing statements are true.

9 

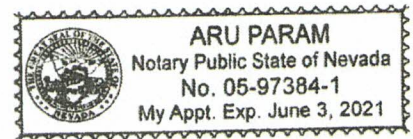
Petitioner's signature

10 Subscribed and sworn to before me this

11 21st day of June, 2019.

12 

13 Notary Public or Clerk of Court



15
16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
17 THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
19 believes it to be in the best interests of the client(s) to designate Raelene K. Palmer, Esq.,
20 (name of local counsel)
21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
22 above-entitled Court as associate resident counsel in this action. The address and email address of
23 said designated Nevada counsel is:

24 The Palmer Law Firm, P.C., 5550 Painted Mirage Road, Suite 320
(street address)

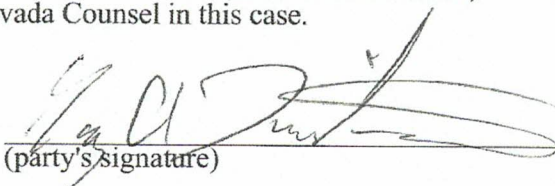
25 Las Vegas, Nevada ☐ 89149
(city) (state) (zip code)

26 (702) 952-9533, RPalmer@PLFLawyers.com
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Raelene K. Palmer as
8 his/her/their Designated Resident Nevada Counsel in this case.
9

10 
11 (party's signature)

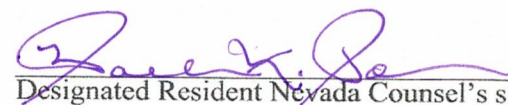
12 Gary A. Quaintance
13 (type or print party name, title)

14 _____
15 (party's signature)

16 _____
17 (type or print party name, title)

18 **CONSENT OF DESIGNEE**

19 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

20 
21 Designated Resident Nevada Counsel's signature

22 8602
23 Bar number

RPalmer@PLFLawyers.com
Email address

24 APPROVED:

25 Dated: this 24th day of June, 2019.

26 
27 UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT

for the
Eastern District of New York

CERTIFICATE OF GOOD STANDING

I, Douglas C. Palmer, Clerk of this Court,
certify that Richard Bruce Herman, Bar # RH6524,
was duly admitted to practice in this Court on 02/28/1984, and is in good standing as a member
of the Bar of this Court.

Dated at Brooklyn on 06/21/2019
(Location) (Date)

Douglas C. Palmer
CLERK OF COURT

Salomon Mejia Jr

DEPUTY CLERK



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Richard Bruce German** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **8th** day of **February 1984**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **June 21, 2019**.



Aprilanne Agostino

Clerk of the Court

Exhibit 1

Exhibit 1

LAW OFFICES
RICHARD B. HERMAN, P.C.

RICHARD B. HERMAN*‡
STEFANIE V. PLAUMANN‡

THE SEAGRAM BUILDING
375 PARK AVENUE, SUITE 2607
NEW YORK, NEW YORK 10152

TELEPHONE (212) 759-6300
FACSIMILE (212) 759-7373
rbh@richardbherman.com
www.richardbherman.com

1717 PENNSYLVANIA AVENUE NW, SUITE 1025
WASHINGTON, DC 20006
(202) 635-1888

OF COUNSEL
BROWN & DOHERTY, P.A.
450 CARILLON PARKWAY, #120
ST. PETERSBURG, FL 33716

ADMITTED:
NEW YORK‡
PENNSYLVANIA*
DISTRICT OF COLUMBIA*
CONNECTICUT (U.S. DIST. COURT ONLY)*

Exhibit to Paragraph 3

Honorable Miranda M. Du
United States District Judge
District of Nevada
400 S. Virginia Street
Reno, NV 89501

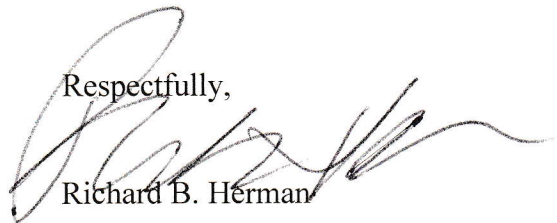
Re: Gary A. Quaintance v. Herb Hallman Chevrolet
Docket No.: 3:19-cv-00340-MMD-WGC

Dear Judge Du:

Due to the exigency of the circumstances in the above-referenced case (deposition testimony of Mr. Quaintance has been ordered to be taken on or about Wednesday, June 26, 2019), the *Pro Hac Vice* Motion filed on my behalf does not have all Certificates of Good Standing attached as exhibits. Certificates of Good Standing are included from New York State and the Eastern District of New York, however, I await the remainder of the Certificates from the Courts set out in paragraph 4 of the motion and will provide them to the Court upon receipt. Since I was last admitted *Pro Hac Vice* in the District of Nevada in 2014, my circumstances have not changed, and I remain in good standing in all courts and jurisdictions to which I am admitted.

Thank you for your kind consideration.

Respectfully,



Richard B. Herman